

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

DECLARATION OF HILLARY MOREAU

HILLARY MOREAU, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

Background

1. I am a United States citizen. I am 53 years old. I am a black man.
2. My address is 48 Creekside Circle, Spring Valley, New York 10977. I reside within the East Ramapo Central School District (“East Ramapo” or the “District”).
3. I have resided in the District for the past 24 years.
4. I currently work at Orange and Rockland Utilities as a Finance Analyst.
5. I am a registered voter in the District.

Voting and Lack of Representation on the Board

6. I have regularly voted in the elections for members of the District's Board of Education (the "Board").

7. In the May 2017 election, none of the Board candidates who I voted for were elected. I voted for Alexandra Manigo, Eric Goodwin, and Chevon Dos Reis, and they all lost.

8. I am aware of and have attended candidate forums hosted in my community at the Louis Kurtz Civic Center. With the exception of Sabrina Charles-Pierre, I am not aware of any current member of the Board participating in any of these candidate forums or any other candidate forum in my community.

9. During election campaigns in my area, I usually see campaign signs and flyers. For example, my candidates of choice in the May 2017 election, Eric Goodwin, Chevon Dos Reis, and Alexandra Manigo had campaign signs and flyers. With the exception of Ms. Charles-Pierre, however, I do not recall seeing any campaign materials for the current Board members.

10. With the exception of Ms. Charles-Pierre, none of the current Board members ever came to my neighborhood to campaign for office. Other politicians have come to my neighborhood when they were campaigning for other elections.

11. Of the three black members of the Board, I voted for Ms. Charles-Pierre. I did not vote for Mr. Germain. I voted for Mr. Charles in 2013 because I know him, and I did not want to vote for his opponent, Kim Foskew, but I did not vote for Mr. Charles in 2016 and would not vote for him again, given his consistent votes against the interests and needs of the minority community, whose children generally attend public schools in the District. I do not recall Mr. Charles or Mr. Germain campaigning in minority neighborhoods or making any effort to appeal to black and Latino voters.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Spring Valley, New York

Nov 26, 2017.

Hillary Moreau
Hillary Moreau